

### **REMARKS**

The Final Office Action (the Action) mailed January 12, 2006 has been reviewed and these remarks are responsive thereto. Claims 1-23 remain pending in this application and currently stand rejected. By entry of this amendment, claims 1, 3, 7, 10, 11, 15, and 17 have been amended. Applicants respectfully request that the patent application be reconsidered in light of the foregoing claim amendments and the arguments which follow.

#### ***Interview Summary***

Applicants thank the Examiner for the telephonic interview with Applicants' representative which took place on March 13, 2006. Particularly discussed was the language of claims 1 and 14—whether or not the references provide a word processing module or the ability to receive edits including the addition of text, formatting, and non-text entries. Rejections with respect to claim 12 were regrettably not discussed. No agreement on the claims was reached.

#### ***Claim Rejections under 35 U.S.C. §103***

The Action rejected claims 1-23 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,526,426 to Lakritz (*Lakritz*) in view of U.S. Patent No. 6,466,900 to Lissauer, *et al.* (*Lissauer*). Applicants respectfully traverse these rejections and request that they be withdrawn and the claims allowed. Arguments in support of this traversal are set forth in some detail below.

#### **Claims 1, 2, 10, 17, and 18**

The Action rejected claims 1, 2, 10, 17, and 18 utilizing various elements of the combination of *Lakritz* and *Lissauer*. The claims have been amended, and therefore this rejection is moot as to these claims. Amendments have clarified the nature of the methods and computer-readable media claimed therein. Claim 1, among other features recites:

receiving edits from a user for a pre-translated document, wherein the edits include the addition of text, formatting, and a non-text entry to the pre-translated document;  
receiving a request to translate the pre-translated document from a first language to a second language;

Independent claims 10 and 17 include similar recitations. Neither *Lakritz* nor *Lissauer* teach or suggest every element of independent claims 1, 10, and 17. Among other features, neither reference provides "receiving edits from a user for a pre-translated document, wherein the edits include the addition of text, formatting, and a non-text entry to the pre-translated document." *Lakritz* merely provides a translation management system in a computer environment. *Lakritz* does not provide any method for receiving user edits to pre-translated documents, such as, for example, word processing capabilities. Rather, *Lakritz* merely translates static content. *Lissauer* similarly does not provide for the receiving of user edits including the addition of text, formatting, and a non-text entry.

Elsewhere, the Action addresses the feature of a "word processing module" alleging that *Lakritz* includes such functionality. Specifically, the Action points to Col. 3, lines 61-67 of *Lakritz*, alleging that the Visitor module disclosed provides a word processing module. *Lakritz* describes the functionality of the Visitor module as:

providing an automated and seamless way to serve content in the correct language  
... It automatically determines the language and country of a Web site visitor and directs the Web server to deliver the appropriate localized content contained in one or more country/language databases. (Col. 3, ll. 54-66)

*Lakritz's* Visitor module is merely a software module for automatically selecting a language for the serving of a web page, as evidenced in the portion of the specification cited above. The Visitor module does not enable receiving edits from a user for a pre-translated document. Nowhere in *Lakritz* are edits for pre-translated documents allowed or enabled. *Lissauer*, moreover, does not repair this deficiency. *Lissauer* does not teach or suggest edits including the addition of text, formatting, and a non-text entry.

For at least these reasons, Applicants respectfully assert that *Lissauer* and *Lakritz*, either alone or in combination, do not teach or suggest every element of independent claims 1, 10, and 17. Applicants request that the rejections of these claims be withdrawn and that they be allowed.

In addition, claims which depend from these independent claims, including 2-9, 11, and 18-23, are allowable for at least the same reasons.

#### Claim 12

The Action rejected claim 12 utilizing various elements of the combination of *Lakritz* and *Lissauer*. Elements of claim 12 particularly include:

issuing, by the client process, an HTTP POST request call having a plurality of call parameters comprising ... and further comprising a data body including the HTML formatted document requiring remote processing ...  
issuing, by the second server process, an HTTP POST request acknowledgement having ... the HTML formatted document processed according to the processing service identifier and represented in HTML format.

As is clear from the language of the claims, the document is delivered using an HTTP POST request and request acknowledgement. The HTTP POST request specifically comprises a data body including the HTML formatted document requiring remote processing. In rejecting this aspect of claim 12, the Action cites C. 15, lines 10-26 of *Lakritz*. The cited portion specifically provides an exemplary AccessLog entry, similar to a web server access log:

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pp93.satcom.net--[28/Jul/1996:23:37:23-0700] "GET/cnv.post/info.html  
HTTP/1.0" 302-pp93.satcom.net--[28/Jul/1996:23:37:24-0700]  
"GET/cnv.post/english-american_United-States/info.html HTTP/1.0"200 3372  
pp93.satcom.net--[28/Jul/1996:23:37:29-0700]  
"GET/cnv.post/coming/flags/United-States.gif HTTP/1.0" 200 3594
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In particular, the Action cites the "GET/cnv.post/english" portion of the AccessLog to cover an HTTP POST request, and states that posting is inherent to a destination server accepting a request for the entity within a request. However, a "GET" entry in a server access log is not a POST request. In point of fact, if a request is sent using an HTTP GET command, it cannot be sent using a POST command. The two request formats are mutually exclusive. Posting is not inherent because *Lakritz* only responds to GET commands for serving multi-language formats of static HTML pages. Nowhere in *Lakritz* is an HTML formatted document requiring remote processing sent as a data body in an HTTP POST request. Furthermore, nowhere in *Lissauer* is an HTTP POST request used to deliver an HTML formatted document requiring remote processing.

Since neither *Lakritz* nor *Lissauer* teaches or suggests every element of claim 12, as well as dependent claim 13, Applicants respectfully request that the rejections of these claims be withdrawn.

Claim 14

The Action rejected claim 14 utilizing various elements of the combination of *Lakritz* and *Lissauer*. In particular, the Action claimed that "a word processing module" was covered by Col. 3, lines 61-67 of *Lakritz*, alleging that the Visitor module disclosed provides a word processing module. As discussed above, there is nothing in *Lakritz* which resembles a word processing module. *Lissauer* does not repair this deficiency.

CONCLUSION

In view of the foregoing amendments and remarks, Applicants respectfully submits that the present application is in condition for allowance. Reconsideration and reexamination of the application and allowance of the claims at an early date are hereby solicited. If the Examiner has any questions or comments concerning this matter, the Examiner is invited to contact the applicant's undersigned attorney at the number below.

Respectfully submitted,

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